

The Honorable James L. Robart

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

NATIONAL INSURANCE CRIME  
BUREAU, an Illinois non-profit corporation,

Plaintiff,

vs.

DESSIE RENEE WAGNER, an individual;  
LESLIE ANN WAGNER, an individual;  
ESTATE OF SCOTT LAVERNE WAGNER;  
LESLIE WAGNER as the Personal  
Representative of the ESTATE OF SCOTT  
ILAVERNE WAGNER, JOSEPH SCOTT  
WAGNER, an individual; ANDREW  
WESLEY WAGNER, an individual,

Defendants.

NO. 2:19-CV-00730 JLR

MOTION TO WITHDRAW AS COUNSEL  
FOR PLAINTIFF

NOTE FOR MOTION CALENDAR: JUNE  
28, 2019

**I. REQUEST FOR LEAVE TO WITHDRAW**

Plaintiff National Insurance Crime Bureau is represented by Laura E. Kruse and Diane H. Cornell of Betts, Patterson & Mines, P.S. As of May 24, 2019, Ms. Kruse is employed by the law firm of Forsberg & Umlauf, P.S.

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MOTION TO WITHDRAW AS COUNSEL  
FOR PLAINTIFF - NO. 2:19-CV-00730 JLR - 1 -

Betts  
Patterson  
Mines  
One Convention Place  
Suite 1400  
701 Pike Street  
Seattle, Washington 98101-3927  
(206) 292-9988

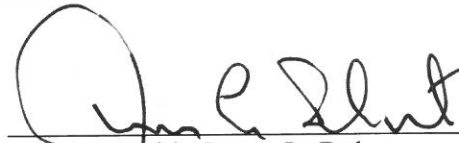
II. STATEMENT OF FACTS

On May 24, 2019 Ms. Kruse started employment with Forsberg & Umlauf, P.S. It is the client's desire to have Ms. Kruse continue her representation of the Plaintiff in this matter. Ms. Kruse and her new firm, Forsberg & Umlauf, P.S., will immediately file a Notice of Appearance for the Plaintiff in this matter, as soon as the Court grants this Motion.

III. ~~PROPOSED~~ ORDER

Submitted with this motion is a proposed order granting this motion, granting Laura E. Kruse and Diane H. Cornell of Betts, Patterson & Mines, P.S. leave to withdraw, and ordering that the withdrawal be effective on the date the order entered. Upon entry of the order granting the withdrawal of Diane Cornell and Laura E. Kruse of Betts, Patterson & Mines, P.S., attorney Laura E. Kruse and Forsberg & Umlauf, P.S. may enter their appearance for the Plaintiff in this matter.

DATED this 28<sup>th</sup> day of June, 2019.



The Honorable James L. Robart  
United States District Judge

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FOR PLAINTIFF - NO. 2:19-CV-00730 JLR - 2 -

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1 Presented by:

2 BETTS, PATTERSON & MINES, P.S.

3  
4 By /s/ Laura E. Kruse

5 Laura E. Kruse, WSBA #32947

6 Email: lkruse@bpmlaw.com

7 By /s/ Diane H. Cornell

8 Diane H. Cornell, WSBA #35090

9 Email: dcornell@bpmlaw.com

10 One Convention Place, Suite 1400

11 701 Pike Street

12 Seattle, WA 98101

13 Tel: (206) 292-9988

14 *Withdrawing Attorneys for Plaintiff*

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MOTION TO WITHDRAW AS COUNSEL  
FOR PLAINTIFF - NO. 2:19-CV-00730 JLR - 3 -

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Mines  
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Seattle, Washington 98101-3927  
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**CERTIFICATE OF SERVICE**

I, Tatyana Stakhnyuk, hereby certify that on June 10, 2019, I electronically filed the following:

- **Motion for Withdrawal as Counsel for Plaintiff; and**
- **Certificate of Service.**

with the Court using the CM/ECF system which will send notification of such filing to all parties of record.

DATED this 10<sup>th</sup> day of June 2019.

/s/ Tatyana Stakhnyuk  
Tatyana Stakhnyuk, Legal Assistant

MOTION TO WITHDRAW AS COUNSEL  
FOR PLAINTIFF - NO. 2:19-CV-00730 JLR - 4 -

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Patterson  
Mines  
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